Dunamis Man / GIS

DUWAMISH MARINA & INDUSTRIAL PARK

% Johnson & Shute, P.S. 2950 Northup Way #200 Bellevue, WA 98004 (425) 827-5755

November 26, 2001

Diane Decker
JSH Properties, Inc.
14900 Interurban Ave. South, Suite 210
Seattle, Washington 98168-4654

RE: Duwamish Marina and Industrial Park

Dear Ms. Decker:

In response to your September 25, 2001 letter regarding the property we lease to Global Intermodal at 1818 South 93rd St, Seattle, I enclose a report prepared by the environmental engineering firm LSI ADAPT. No significant environmental concerns are reported beyond several housekeeping measure, which we intend to address.

If need be, you can reach me at the following: (206) 369-1937 – mel@hester.com My mailing address is (b)(6) 40th St. Kirkland, WA 98034.

Cordially,

Mel Hester

Partner

SITE AND PROJECT DESCRIPTION

A Location/Topographic Map (Figure 1), and Site Plan (Figure 2) are attached at the end of the report.

Location

The subject site is located at 1818 South 93rd Street in Seattle, King County, Washington (Section 33, Township 24 North, Range 4 East, Willamette Meridian).

Site Description

The subject site is leased by Global Intermodel (GIS) Systems and is currently used as a container storage and repair/maintenance facility (Photo 1). Presently located on the facility grounds is an office building, a main container and equipment repair and maintenance shop building, two container washing areas, a Genset repair and maintenance building, multiple containers used for storage of miscellaneous materials, dumpsters for miscellaneous materials, a single diesel fuel tank, multiple storm drains, and empty containers stacked on the northernmost, westernmost, and southernmost portions of the grounds. Selected photographs of the subject site and pertinent operations/activities are included in Appendix A.

REGULATORY RECORDS REVIEW

ADAPT reviewed publicly available and practically reviewable regulatory agency reports generated from databases with respect to the subject site. The reports, obtained from federal, state, and local government agencies, were reviewed in an effort to document any reported environmental concerns that have occurred at the subject site. The following reports were reviewed:

- U.S. Environmental Protection Agency (EPA) Comprehensive Environmental Response, Compensation, and Liability Information System (CERCLIS) report and sites on the National Priority List.
- Washington State Department of Ecology's (Ecology) Confirmed and Suspected
 Contaminated Sites report.
- The EPA's Resource Conservation and Recovery Act (RCRA) total notifiers report, including RCRA Treatment, Storage, and Disposal
- (TSD) facilities (one-half mile), and TSD facilities subject to Corrective Action
 (CORRACTS) under RCRA.
- Ecology's listing of registered Underground Storage Tanks.
- Ecology's listing of Leaking Underground Storage Tanks.
- Emergency Response Notification System (ERNS) Spill Report.

ADAPT also interviewed personnel at state and local agencies including the Seattle Sewer Department, and Fire Department for information regarding compliance to applicable permits and any hazardous material responses or site inspections.

ADAPT also reviewed Global Intermodal Systems environmental compliance paperwork available on-site including: a Storm Water Pollution Prevention Plan, various permits, Hazardous Material Transport Manifests, MSDSs, and the Spill Response Plan. The Storm water Pollution Prevention Permit, the approval for discharge to the sanitary sewer and the RCRA file contents are attached in Appendix B.

Regulatory and On-site Paperwork Review findings

The subject site Giobal Intermodal Systems (GIS) is listed on the RCRA database as a small quantity generator producing or disposing of between 220 lbs and 2200 lbs in one month. Onsite documents including hazardous waste transport manifests appear to indicate that the facility has disposed of less than 2200 lbs of reportable hazardous material per month for at least the last ten years.

According to our interviews with state and local officials there are no reported violations of any existing permits for the subject site. An undated site inspection sheet from the Local Hazardous Waste Management Program in King County indicated that the subject site was in regulatory compliance.

ADAPT noted that at the time of the site visit all reviewed permits and Best Management Practices (BMPs) appeared to be in compliance with applicable industrial standards. In addition based on the site walk-through the various BMPs including the Storm Water Pollution Prevention Plan, the Spill Response Plan and discharge permit for the wash water requirements appeared to be followed.

ADAPT also reviewed laboratory results collected from the wastewater treatment system prior to the discharge into the sanitary sewer. Based on the laboratory results dated from 1993, 1994 and 1998 wastewater did not exhibit detectable concentrations of volatile organic compounds. According to King County Industrial Waste Section there are no requirements for frequency of analytical sampling. The initial approval letter dated June 22, 1993 from Metro (now King County) indicated that oil and grease concentrations cannot exceed 100 milligram per liter. Based on the reviewed results dated June 23, 1998 by Foss Environmental oil and grease concentrations were 2.5 milligram per liter.

SITE INSPECTION

Site reconnaissance was conducted by ADAPT representatives on 11/1/01. The reconnaissance consisted of walking throughout the grounds on the subject property and review of the environmental compliance paperwork located in the main office building.

Container & Equipment Repair and Maintenance shop

The Container & Equipment Repair and Maintenance shop building includes an enclosed concrete floor, two floor drains, paint storage room, office space, restroom, lunchroom/break room, and parts storage area. Specific observations included the following:

- The main floor includes: two floor drains one located under a freight container and reportedly capped, and one located in the southwest portion of the building that did not have a protective filter sock and had some moisture/mud in the bottom of the drain.
- A paint storage room is located along the western wall of the building. The room contained numerous 5-gallon and 1-gallon containers of paint, a 55-gallon metal drum of xylene (reportedly used to clean surfaces prior to painting (Photo 2). The floor and walls were heavily stained with paint. The paint room itself had a heavy solvent (xylene) odor and no apparent ventilation.
- A parts cleaner basin was located on the building's northern wall which reportedly uses citric based cleaners and is emptied by recycling services on an as needed basis (Photo 3). Minor black staining was observed on floor beneath basin.

- A closed flammable storage cabinet used to store paint sprayers was located adjacent to
- Two air compressors both reportedly used for air storage with only one currently operational. Minor to moderate staining of an oil/water mixture was noted beneath the non-operational compressor tank (Photo 4).
- The oil storage area was observed as housing both new and used oils stored in 55gallon drums, and lubricants stored in 5-gallon containers (Photo 5). The oil storage area was located behind an approximate 18" high concrete berm. Minor petroleum staining was observed on the concrete floor in front of the oil containment structure, and beneath the oil drums within the structure. An oil absorbent material was being used to soak up

Outside Covered Area of the Container & Equipment Repair and Maintenance shop

On the north side of the Container & Equipment Repair and Maintenance shop is a covered work area. The covered area is used for trailer and container repair (Photo 6). The covered work area has a concrete floor with two floor drains. ADAPT observed the eastern floor drain, the western floor drain was reportedly covered by a container and inaccessible. The observed floor drain had a torn filter sock with apparent muddy water flowing into the drain. At the time of the site visit an open container of a liquid with a solvent odor was observed on a trailer near the floor drain. The container was moved to a table on the south wall. Minor oil staining was noted

Container Wash Areas

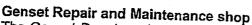
Two container wash areas were observed on the grounds - one adjacent to the main shop building and one on the eastern edge of the property. The western wash water has one trench drain which reportedly drains to a settling tank then to a water recovery and treatment system located in a converted freight container adjacent to the western wash area (Photo 7 and 8). Treated water is then reportedly discharged to the sanitary sewer. The eastern wash area has two trench drains which reportedly drain to an approximate 500-gallon collection tank (Photo 9), then to a preliminary filter system in an approximate 55-gallon trash can that is then reportedly pumped to the main water treatment system near the western wash area. Water in drainage trenches appeared dirty but no petroleum-like sheen was visible, nor were there petroleum-like odors (Photo 10). High-pressure water and no cleaners or detergents are used in the wash

Fueling Area

The fueling area is used to fuel the site forklifts. At the time of the site visit the fueling area contained one approximate 500-gallon diesel aboveground storage tank (AST) (Photo 11). The AST is reportedly double-walled and has an approximate four-inch asphalt berm around the tank on the ground. Minor petroleum stains were noted on the ground around the tank.

Refrigeration repair area:

The refrigeration repair area is located south of the eastern wash area. At the time of the site visit ADAPT representatives noted 5- to 10-gallon capacity metal tanks of new refrigerant for repaired and maintained refrigeration units. Used refrigeration oil is stored in a 55-gallon drum located in a container, and disposed of offsite by recycling services on an as needed basis. According to on-site personnel, repair of compressors reportedly takes place in a covered area, or in a converted/empty freight container used as the repair shop.



The Genset Repair and Maintenance shop consists of a metal-framed building with a concrete floor. The shop is reportedly used to store new and used parts, and equipment for repair of Genset units. A Genset unit is generator with attached diesel fuel tank, and is used to provide auxiliary power for refrigerated containers when required. A two-chamber sump was observed in the floor of the shop (Photo 12). The sump was covered by metal plates. According to GIS personnel the sump is not in use. Water was observed in both chambers of the sump and appeared to be dark and stagnant, and exhibited organic (sewage) odors (Photo 13). Several plastic 5 and 15-gallon containers of cleaning solutions were observed throughout the shop building. These containers appear to contain nontoxic cleaning solutions, and were reportedly used to clean a container that had rotten squid several years ago.

Genset Repair storage container

A small container located west of the Genset Repair and Maintenance shop is used for repair of the Genset units. According to GIS personnel the units are cleaned and repaired in the container. Used oil and diesel is removed and placed in drums and containers. During the site visit ADAPT observed four 55-gallon drums containing used and new oil and diesel fuel situated in secondary containment and plastic tubs (Photo 14). In addition, ADAPT observed several batteries in plastic tubs and moderate oil/petroleum staining on the floor of the container.

Storm water catch basins

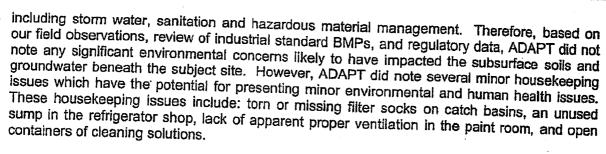
The subject site has a storm water collection system including catch basins and underground piping. According to GIS personnel, and a review of a provided site map, the storm water system is connected to either the sewer system in South 96th Street, or discharges directly to the Duwamish River. ADAPT was unable to locate a discharge point into the Duwamish River from the subject site. The catch basins are located in areas with appropriate drainage patterns to collect storm water runoff on site. As per the reviewed Storm Water Pollution Prevention Plan, each catch basin is required to have a filter sock to prevent sediment from entering the storm water system. At the time of the site visit ADAPT was informed that the filter socks were scheduled to be changed soon (within two weeks). According to GIS personnel, the filter socks are changed at least twice a year, or if observations indicate the integrity of the filter sock has been damaged. ADAPT observed that several catch basins did not have filter socks and that several had torn socks (Photos 15 and 16). Due to the locations of the stored freight containers, some of the catch basins were not observable. The catch basins observed near the container washing areas appear to be protected by berms to prevent wash water from entering catch basins. One catch basin was noted in the parking area and water entering it exhibited a minor oil sheen. The sheen is likely from motor oil staining observed in the parking area and is not considered a significant environmental concern.

Asphalt Paved Parking and Driveway Areas

Minor oil staining was observed on asphalt pavement in parking and driveway areas. The staining is typical of parking lots and is not considered a significant environmental concern.

SUMMARY AND CONCLUSIONS

In summary, the subject site is used for storage, repair and maintenance of freight containers including their associated refrigeration units. Repair and maintenance includes cleaning, damage repair, painting of the repaired areas, maintenance of attached refrigeration units and Genset units, including replacement of coolant. Waste manifests reviewed indicate that waste material is transported offsite on an as needed basis in accordance with federal, state and local regulations. In addition, the subject site is apparently in compliance with all appropriate permits



RECOMMENDATIONS

Based on the results of the Limited Environmental Audit there do not appear to be any significant immediate environmental concerns on the subject site. However, two issues that may have some potential for allowing undocumented releases of regulated waste, or discharge of sediment to storm water catch basins including an inactive sump, and damaged, or missing filter socks. The strong (overpowering) odor of solvent in the paint room has the potential to become a worker for a health and safety issue, and improved ventilation methods might be considered.

ADAPT observed a two-chamber sump in the floor of the Genset Repair and Maintenance Shop with stagnant water. According to on-site personnel the sump was not in use and had not been for sometime. ADAPT believes that if the sump is not in use and there is no plan to use in the foreseeable future, the sump should be pumped dry and either capped and closed-in-place or removed.

At the time of ADAPT's site visit several of the storm drain catch basin filter socks were either missing or had holes or tears. The purpose of the filter socks is to prevent the discharge of sediment laden water into the storm water sewer. BMPs and Storm Water Prevention Plans suggest filter socks to help reduce the sediment discharge from storm water runoff. On-site personnel indicated during the site visit that all filter socks are reportedly replaced twice a year and that the filter socks are routinely monitored between semi-annual replacements. Based on the observations, ADAPT believes it would be prudent to increase the frequency of monitoring to identify damaged socks with immediate replacement to reduce the discharge of sediment into the storm sewer system.

During ADAPT's site visit the paint storage room had an overpowering odor of solvent, likely xylene. During ADAPT's brief visit we noted that there did not appear to be any ventilation for the paint room. ADAPT believes it would be prudent to evaluate the need for ventilation in the paint room to prevent potential human health or fire concerns.

ADAPT appreciates the opportunity to be of service to you on this project. Should you have any questions concerning this report, or if we can assist you in any way, please feel free to contact us at (206) 654-7045.

Respectfully Submitted,

LSI ADAPT, Inc.

Margi Lewis

Environmental Scientist

Keith A. Ross, P.G.

Senior Environmental Project Manager

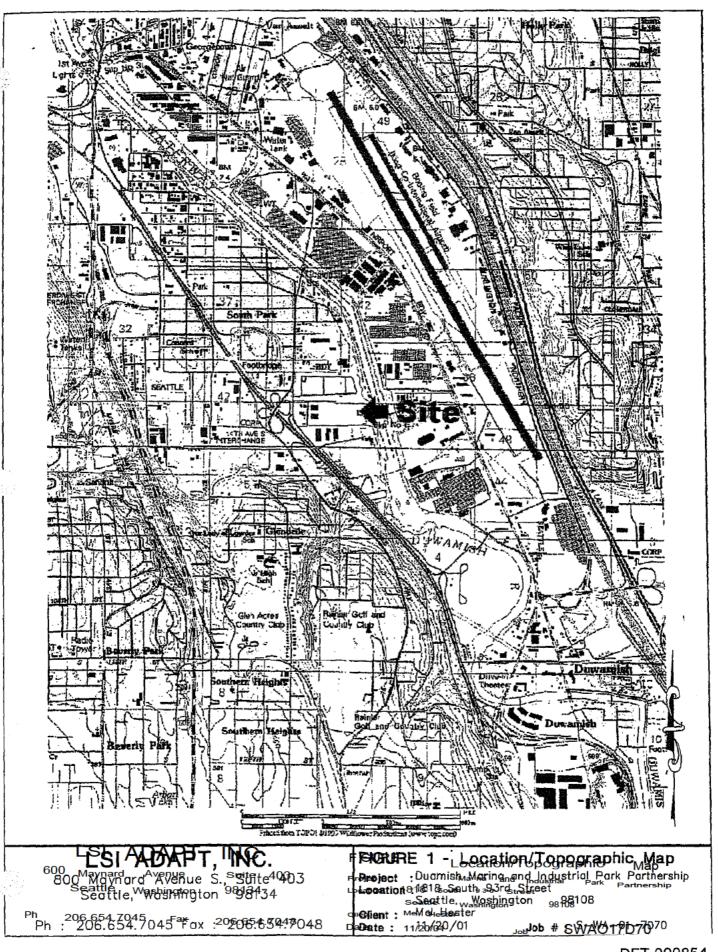
Daryl Petrarca, R.E.A.

Senior Reviewer Environmental Services

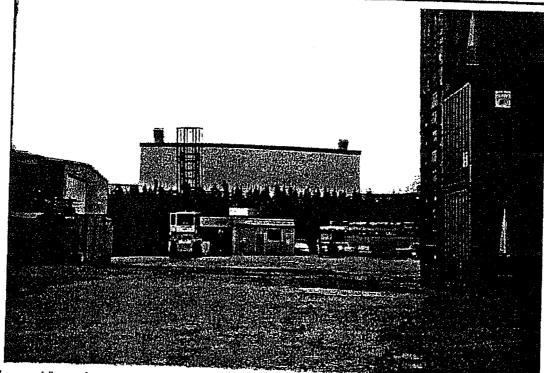
Attachments:

Appendix A - Selected Photographs

Appendix B - Selected Permits and Documents



APPENDIX A SELECTED PHOTOGRAPHS



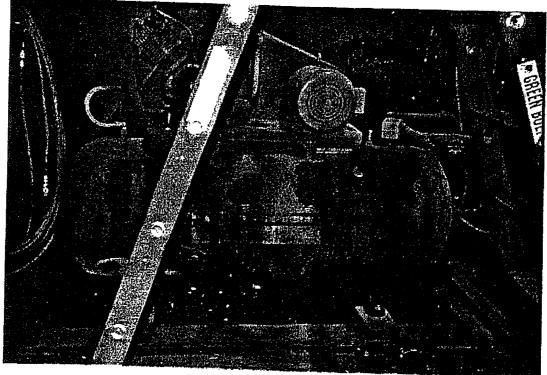
 View of subject site showing office with main maintenance shop on the left. Note stacked stored freight containers on the right.



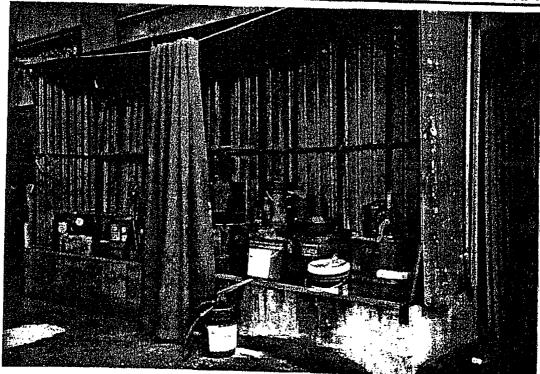
 View of paint storage room. Note paint staining. Xylene drum on right wall behind paint (black object is pump in drum).



 View of parts washer on north wall of main shop. Note minor black staining on concrete floor.



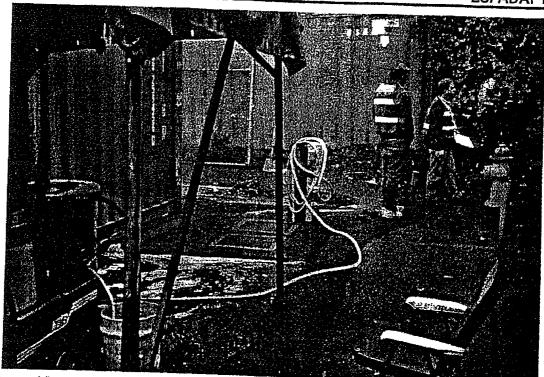
4. View of unused air compressor showing water/oil staining on tank and wall.



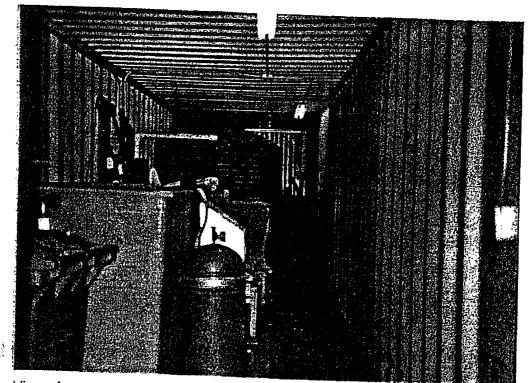
 View of new and used oil storage area in main shop building. Note absorbent material at lower left.



View of covered shop area showing trailers being repaired.



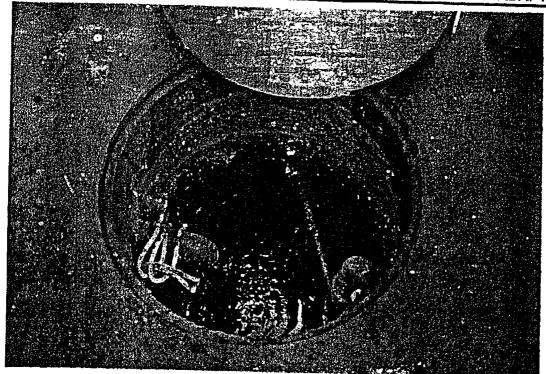
View of western wash area trench drain and settling tanks. Trench drain in background and settling tanks are beneath the two metal plates in the center of the photograph. Note asphalt berm surrounding area. Water treatment container in background.



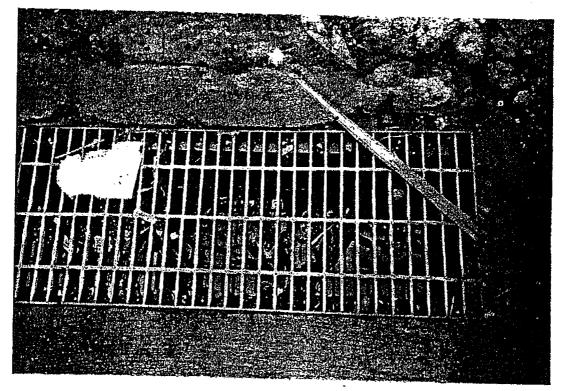
8. View of water treatment equipment in freight container.

DFT 000859

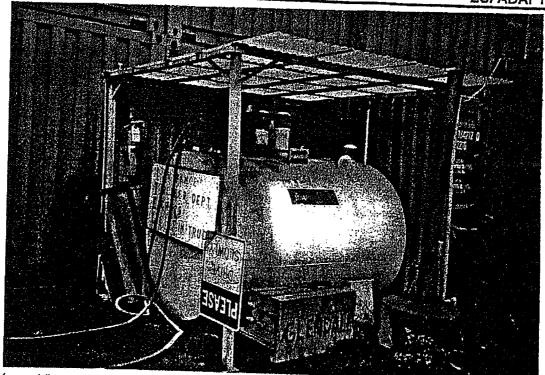
MINISTERNATION CONTRACTOR



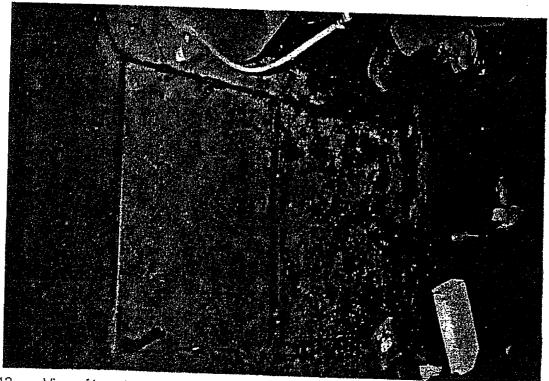
9. View of water collection tank for the eastern wash area.



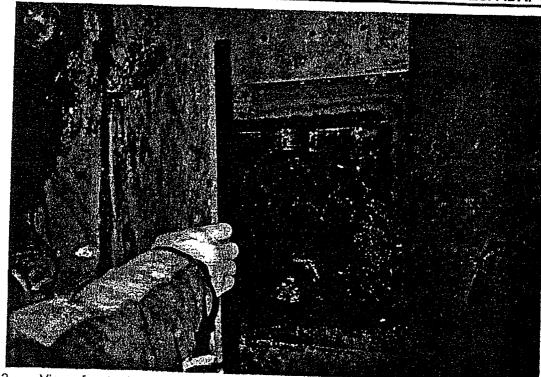
10. Close-up view of trench drain for the eastern wash area. Note debris in water.



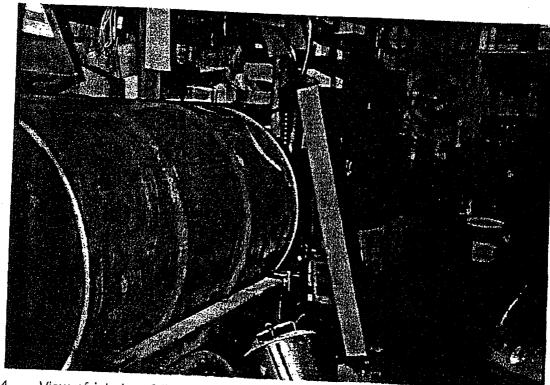
11. View of diesel AST in fueling area. Note minor staining on asphalt near hose.



12. View of two chamber sump in Genset maintenance shop.



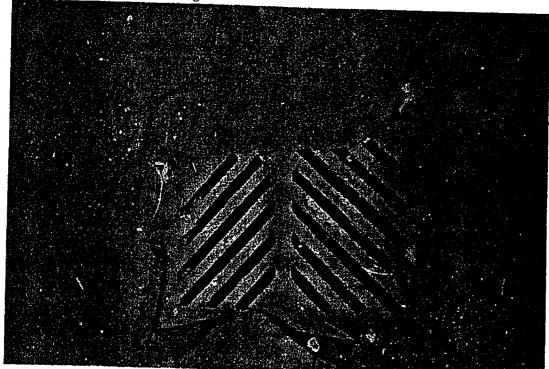
 View of water in sump. Water was black with an organic (sewer) odor. No sheens were observed.



14. View of interior of the Genset repair shop (container). Note plastic secondary containment for the miscellaneous drums and containers of oil, and diesel.



15. View of catch basin with no filter sock. Note sediment and rocks entering basin. This catch basin located in the unpaved area of the site in the container storage area near the entrance gate.



16. View of catch basin with a filter sock. Filter sock appeared almost full of sediment. This catch basin was located in the asphalt paved area of the container storage area.

APPENDIX B SELECTED PERMITS AND DOCUMENTS

GLOBAL INTERMODAL SYSTEMS SO3-001330

Industrial Stormwater General Permit Coverage Date: November 18, 2000 Expiration Date: November 18, 2005

Facility Location

Address: 1818 S 93RD ST

SEATTLE

Acres: 10

*WRIA: 08 - CEDAR-SAMMAMISH

County: KING COUNTY

Contact Person: MARK GONZALES

(206) 762 4248

Mailing Address

GLOBAL INTERMODAL SYSTEMS

1818 S 93RD ST

SEATTLE, WA 98108-5121

Billing Address

GLOBAL INTERMODAL SYSTEMS

MARK GONZALEZ 1818 S 93RD ST SEATTLE, WA 98108

Primary SIC

3441 - FABRICATED STRUCTURAL METAL

*WRIA, Water Resource Inventory Area

**SIC, Standard Industrial Code

Melodie A. Selby, P.E.

Section Manager

Melodo Sel

Water Quality Program

Facility Data

Global Intermodal Systems 1818 S 93RD ST

SEATTLE, WA 98108-5121

Contact (HWSC): Mark Gonzalez (206)762-4248

EPA ID: WAD 981 764 558

FS.ID: 86343865

County: KING Region: NWRO

Generator Status

SQG

SIC Codes(s)

Description

3441

FABRICATED STRUCTURAL METAL

3799

TRANSPORTATION EQUIPMENT, NEC

Forms Contact: Mark Gonzalez (206)762-4248

Global Intermodal Systems Attention: Mark Gonzalez

1818 S 93RD ST

SEATTLE, WA 98108-5121

Site Contact: Mark Gonzalez (206)762-4248

Global Intermodal Systems Attention: Mark Gonzalez 1818 S 93RD ST

SEATTLE, WA 98108-5121

Generator Status History

Global Intermodal Systems 1818 S 93RD ST SEATTLE, WA 98108-5121

EPA ID: WAD 981 764 558

FS ID: 86343865

County: KING Region: NWRO

Contact (HWSC): Mark Gonzalez (206)762-4248

Generator Status

SQG								
SIC Codes(s)	Description							
3441	FABRICATED STRUC	TURAL METAL						
3799	TRANSPORTATION EQUIPMENT, NEC							
Generator Status	Reporting Year			***************************************				
SQG	2000							
SQG	1999			•				
SQG	1998							
SQG	1997							
sqg	1996							
MQG	1995							

Waste Stream Details For Reporting Years: 1993 To 1994

Global Intermodal Systems

1818 \$ 93RD ST

SEATTLE, WA 98108-5121

Contact (HWSC): Mark Gonzalez (206)762-4248

EPA ID: WAD 981 764 558

FS ID: 86343865

County: KING

Region: NWRO

Generator Status

SQG

SIC Codes(s)

Description

3441

FABRICATED STRUCTURAL METAL

3799

TRANSPORTATION EQUIPMENT, NEC

1994 SEQ#1 XYLENES, MINERAL SPIRITS, TOLUENE, CHLOROSULFONATED-ALKYD **RESIN, PAINT PIGMENTS**

Pounds: 823 Origin: Recurrent Designation: EHW

Source: Other (A99)

State Code(s): WP01 WT01

EPA Code: D001

EPA Code: F005

EPA Code: F003

EPA Code: F002

1993 SEQ#1 XYLENES, MINERAL SPIRITS, TOLUENE, CHLOROSULFONATED-ALKYD

RESIN, PAINT PIGMENTS

Pounds: 411 Origin: Recurrent Designation: EHW

Source: Other (A99)

State Code(s): WP01 WT01

EPA Code: D001

EPA Code: F005

EPA Code: F003

EPA Code: F002

Yearly Recurrent Waste Totals

Global Intermodal Systems 1818 S 93RD ST

SEATTLE, WA 98108-5121

Contact (HWSC): Mark Gonzalez (206)762-4248

EPA ID: WAD 981 764 558

FS ID: 86343865

County: KING

Region: NWRO

Generator Status

SQG				
SIC Codes(s)	Description	•		
3441	FABRICATED STRUCTURAL METAL			
3799		I EQUIPMENT, NEC		
YEAR	ON SITE POUNDS	OFF SITE POUNDS	TOTAL POUND	
<i>YEAR</i> 1994		_		

Kristin Painter 263-3000

Municipality of Metropolitan Seattle

Industrial Waste • 130 Nickerson St., Suite 200 • Seattle, WA 98109-1658 • (206) 689-3000

July 29, 1993

CERTIFIED MAIL RETURN RECEIPT REQUESTED

Vanessa Balchen Operations Manager Itel Terminals 1970 Broadway, Suite 735 Oakland, California 94612

Discharge Approval for Itel Terminals - Seattle

Dear Ms. Balchen:

I have received your letter dated July 21, 1993 requesting Metro authorize a wash pad for Itel Terminals - Seattle of 2100 square feet rather than the usual 200 square feet. We are granting this variance since the size of the equipment you typically wash would not fit in 200 square feet. This approval amends the previous approval I sent you dated June 22, 1993.

If you have any questions, please contact me at 689-3009. Thank you for your cooperation in this matter.

Sincerely,

Christie J. True

Senior Industrial Waste Investigator

Industrial Waste Section Environmental Prógrams

CJT:sb

cc: Doug Knutson, Dept. of Ecology Victor Lee, City of Seattle

Doug Hilderbrand, Metro

TRUE \ DWAITEL

Local Hazardous Waste Management Program in King County

Anditor	Tariffer of Visit:	✓ if product	Mo. Gen. Rate	Units	Pounds	Disposition 1	Proper disp 2	opiii materaiis? Container conc.	Cont. closed?	_abeled?	2"ary Con ?	Vienifests?
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Municipality of Metropolitan Seattle

Industrial Waste • 130 Nickerson St., Suite 200 • Seattle, WA 98109-1658 • (206) 689-3000

June 22, 1993

CERTIFIED MAIL
RETURN RECEIPT REQUESTED

Vanessa Balchen Operations Manager Itel Terminals 1970 Broadway, Suite 735 Oakland, California 94612

Discharge Approval for Itel Terminals - Seattle

Dear Ms. Balchen:

Your discharge request and plans for wastewater treatment using the Simpson Filtration System at the Itel Terminals facility located at 1818 South 93rd Street, Seattle, Washington have been reviewed by the Industrial Waste Section of Metro. Approval is hereby given for the discharge of up 1000 gallons per day of treated wastewater from cleaning the cargo containers.

Discharge of treated wastewater to the sanitary sewer is authorized subject to the following conditions:

- No significant amount of storm drainage shall enter the sanitary sewer; i.e., the uncovered area tributary to the separator shall not exceed 200 square feet.
- 2. The oil/water separator shall be properly maintained so that effluent from these structures does not exceed the Metro discharge limitation of 100 milligrams per liter (mg/l) of mineral/petroleum (nonpolar) fats, oils, and grease (FOG) or 100 mg/l of animal vegetable (polar) FOG.

This approval does not in any way guarantee that the oil/water separator will function as described by the fabricator or manufacturer. Further, the approval does not relieve Itel Terminals or any subsequent operator, of the responsibility to enlarge, modify or replace the oil/water separator to meet Metro discharge requirements.

Ms. Vanessa Balchen June 22, 1993 Page 2

If you have any questions, please contact me at 689-3009. Thank you for your cooperation in this matter.

Sincerely,

Christie J. True

Senior Industrial Waste Investigator

Industrial Waste Section Environmental Programs

CJT:sb

Doug Knutson, Dept. of Ecology Victor Lee, City of Seattle Doug Hilderbrand, Metro

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